February 24, 1988

Mr. Dennis Huebner
Chief, NH/RI Waste Management Branch
United States Environmental Protection
Agency, Region I
J.F.K. Federal Building
Boston, Massachusetts 02203

Re: Technical Meeting To Review Data Collection Plans at Ciba-Geigy's Cranston Facility

Dear Mr. Huebner:

As you know, Ciba-Geigy has been conducting various on-site studies at its Cranston facility to make a preliminary determination of the nature and extent of any contamination present at the facility. The purpose of this letter is to confirm a technical meeting with Region I of EPA to review Ciba-Geigy's plans to further assess conditions at the site in anticipation of EPA action.

Ciba-Geigy recognizes that EPA has not formally requested or sanctioned the Company's efforts to obtain information regarding the conditions at its Cranston facility. Nonetheless, Ciba-Geigy believes that it would be productive to meet with technical personnel from Region I in order to review the data collection steps taken to date and to outline planned additional steps. Ciba-Geigy's technical personnel consider the opportunity to confer with EPA's technical representatives regarding sampling protocols, test methods, and sampling locations to supplement the currently available data to be critical to the study.

Ciba-Geigy understands that the Agency would only be providing technical comments on testing being independently undertaken by the Company at the Company's own risk. The Agency's comments on the Company's past and projected data collection efforts would be considered to be only informal advice. Ciba-Geigy acknowledges that such comments would not in any way limit the Agency's authority to require Ciba-Geigy subsequently to develop different or additional information or to decide to develop such information through its own resources.



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Although Ciba-Geigy recognizes these limitations, the Company nonetheless believes that such a meeting would benefit all parties by developing further technical information regarding the Cranston site. I look forward to discussing this additional sampling proposal with your staff on Friday, February 26, 1988.

Sincerely yours,

James E. Crowley

Director, Safety & / Environmental Compliance